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May 6, 2016

VIA ECF

Honorable Judge Vernon S. Broderick
United States District Court
Southern District of New York
New York, NY 10007

Re: Matter: Vincent & Serna v. City of NY et al
Docket: 14CV07744 (VSB)

Dear Honorable Judge:

Please remember that I am the attorney of record for the Plaintiff, Sean Vincent, in the above captioned matter. I write in response to the City Law Department's letter of May 3, 2016 (Docket # 60) ("City Letter"). Based upon the City's objection to Plaintiff's request to file the First Amended Complaint, and in light of the current Rule 12(c) motion schedule concerning the current operative complaint, it is respectfully requested that this Honorable Court grant leave for Plaintiff to cross-move to amend the complaint.

Currently the Plaintiff's opposition papers to the Defendants' Rule 12(c) motion are due May 10, 2016 and the Defendant's Rule 12(c) reply papers are due May 24, 2016. Due to the delay concerns set out in the City Letter, Plaintiff hereby limits his request for an extension of time to file both the Rule 12(c) opposition and cross-move for leave to amend the complaint to three days, from May 10 to May 13, 2016. Plaintiff consents to the City receiving the same three day extension from May 24 to May 27, 2016 to file their reply and opposition to the cross-motion. Plaintiff would ordinarily request two weeks, until June 10, 2016, for the reply in further support of the cross-motion. However, in those two weeks fall Memorial Day Weekend, Figment Weekend on Governor's Island (the undersigned is a co-founder and serves on the Board and as General Counsel for this interactive art non-profit), and a previously scheduled five day trip to Tennessee (June 9-13). Respectfully, Plaintiff requests until June 17, 2016 for the

reply in further support of the cross-motion. Earlier today I sent e-mails and left voice mails for ACC Weiss and ACC Lucas concerning this request but have not been able to reach a City representative to understand whether they object, consent or take no position. Earlier this week I had asked if they would consent to an extension of time for me to file my opposition brief and the Defendants did reply that they took no position.

Although the City Letter sets out substantive arguments that Plaintiff believes are both unconvincing and inconsistent with the City's moving brief, rather than responding in a letter, Plaintiff will set forth these arguments in his memorandum of law

Respectfully submitted,

/s/

Wylie M. Stecklow, Esq.

cc: ACC JOY ANAKHU (via ECF)
ACC ANDREW LUCAS (via ECF)
ACC DARA WEISS (via ECF)
ACC LAMAR WINSLOW (via ECF)